IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,)
Plaintiff,)
v.) CIVIL ACTION NO.
STAR MANAGEMENT CORP., ET AL.,)
Defendants.)
)

CONSENT MOTION FOR ENTRY OF CONSENT ORDER AND BRIEF IN SUPPORT

Plaintiff, United States of America, pursuant to Rule 7(b) of the Federal Rules of Civil Procedure, respectfully moves the Court to enter the attached proposed Consent Order lodged contemporaneously with this motion to resolve the United States' civil action brought to enforce the Fair Housing Act ("FHA"), 42 U.S.C. §§ 3601 – 3619, and the Americans with Disabilities Act ("ADA"), 42 U.S.C. §§ 12181 – 12189.

In support of this motion, the United States represents that it filed a complaint with the Court alleging violations of the FHA and the ADA. *See* ECF No. 1. The Consent Order is agreed to by the parties for the purpose of resolving disputed claims under the FHA and ADA, is fair, adequate, and reasonable, and is not illegal, a product of collusion, or against the public interest. The Defendants consent to this motion. The United States respectfully requests that the Court enter the Consent Order immediately.

Dated: February 27, 2020

FOR THE UNITED STATES:

W. STEPHEN MULDROW United States Attorney District of Puerto Rico

/s/ Hector E. Ramirez
HECTOR E. RAMIREZ
USDC-PR No. 214902
Assistant United States Attorneys
Torre Chardon, Suite 1201
350 Carlos Chardon Street
San Juan, PR 00918
Phone: (787) 282-1845
Birmingham, AL 35203

E-mail: hector.e.ramirez@usdoj.gov

ERIC S. DREIBAND Assistant Attorney General Civil Rights Division

/s/ Noah D. Sacks
SAMEENA SHINA MAJEED
Chief, Housing and Civil
Enforcement Section
ANDREA STEINACKER
Special Litigation Counsel
RYAN G. LEE
NOAH SACKS
Trial Attorneys
Department of Justice
Civil Rights Division
Housing and Civil Enforcement Section
150 M. Street, N.E., 8th Floor
Washington, DC 20530
Tel: (202) 305-3109; Fax: (202) 514-1116

ryan.lee@usdoj.gov